



STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

**Public Hearing – March 10, 2016
Energy and Technology Committee**

**Testimony Submitted by Arthur A. House, Chairman, Public
Utilities Regulatory Authority (PURA)**

**S.B. No. 345 (RAISED) AN ACT REQUIRING A STUDY OF THE
DIVERSITY OF ENERGY SOURCES IN THE STATE**

PURA **does not support** this proposal as it lack direction and sufficiently detailed guidance regarding the purpose, objectives, deliverables and expectations for the proposed study. In addition, PURA cannot determine what the fiscal impact would be (it could be substantial) or whether we have sufficient staff expertise to conduct whatever study the proponents of these two bills have in mind. The study appears to duplicate work performed by the Department of Energy and Environmental Protection (DEEP) – Bureau of Energy Technology and Policy (BETP), which studies the diversity of energy as part of its work on the Integrated Resources Plan (IRP) and the Comprehensive Energy Strategy (CES).

**H.B. No. 5502 (RAISED) AN ACT REQUIRING THE STUDY OF
TELECOMMUNICATIONS IN THE STATE**

**H.B. No. 5503 (RAISED) AN ACT REQUIRING THE STUDY OF
THE USE OF TECHNOLOGY IN THE STATE**

PURA **does not support** these two proposals as they lack detail and sufficiently detailed direction regarding the purpose, objectives, deliverables and expectations for the studies. PURA cannot determine what the fiscal impact would be (it could be substantial) or whether we have sufficient staff expertise to conduct whatever studies the proponents of the two bills have in mind.

**H.B. No. 5509 (RAISED) AN ACT CONCERNING STAFFING
LEVELS FOR ELECTRIC SERVICE LINEWORKERS**

The proposed legislation would require each electric distribution company (EDC) to employ a minimum number of electric service line workers per customers served and submit this number in its annual maintenance plan to PURA. **PURA does not support** this legislation. PURA believes that it should continue to review and analyze the issue of staffing levels, system reliability and related costs through adjudicated proceedings such as rate cases and make any needed adjustments after careful assessment of what kind of work is evaluated and what resources are needed. Some customer service challenges can be resolved by a small number of professionals with particular expertise and special equipment. Other challenges require more labor-intensive solutions. A set standard of line workers per customer served makes no sense.

Through adjudicated proceedings, PURA's staff and those of other agencies including the Office of Consumer Counsel and the Attorney General can review staffing level filings made by the EDCs, cross-examine company witnesses and reach informed decisions regarding appropriate staffing levels. Moreover, the number of line workers required throughout the year will vary depending on a number of variables including weather, storm outages, maintenance schedules, system upgrades, resiliency projects and new construction.

H.B. No. 5510 (RAISED) AN ACT CONCERNING ELECTRIC, ZERO EMISSION AND FUEL CELL ELECTRIC VEHICLES

PURA has two suggestions regarding this proposed legislation:

It appears as though Section 4(9) (b) of the bill is missing a comma where one is included in Section 4(9) (c) of the proposal, which correctly separates the municipalities from PURA jurisdiction regarding ratemaking. PURA suggests the language be revised to read "The Public Utilities Regulatory Authority, with respect to each electric public service company, and each municipal electric company, shall. . ."

Secondly, Section 5 (a) of the bill states that "PURA shall require each electric distribution company (EDC) to integrate electric vehicle charging load projections into the EDCs distribution planning. Such projections shall be based on the number of electric vehicles registered in the state and projected increases or decreases in sales of such vehicles". Section 5(b) then goes on to state "Not later than January 1, 2017, and annually thereafter, each electric distribution company shall publish on such company's Internet web site a report explaining the incorporation of such company's electric vehicle charging load

projections for the company's distribution planning.” It appears from the language of the bill that the EDCs do not need approval of their EV customer adoption projections. These projections form the basis of future distribution facilities planning and building. Absent any form of review, the EDC’s natural financial incentive to build new distribution facilities could lead to an incentive to over-project EV customer adoption. PURA strongly suggests that the legislation include a requirement that the EDCs projections on EV customer adoption rates be reviewed for reasonableness prior to allowing the integration of these projections into distribution planning. At the very least, the projections should be consistent with projected EV adoption rates outlined in the Comprehensive Energy Strategy.

PURA appreciates the opportunity to present testimony regarding these proposals. If you should require additional information, please contact Nick Neeley, PURA’s legislative director, at 860-827-2625 or Nicholas.Neeley@ct.gov